

1 BLANK ROME LLP
2 Ana Tagvoryan (SBN 246536)
3 ATagvoryan@BlankRome.com
4 Safia Hussain (SBN 251123)
5 SHussain@BlankRome.com
6 Harrison Brown (SBN 291503)
7 HBrown@BlankRome.com
8 2029 Century Park East, 6th Floor
9 Los Angeles, CA 90067
10 Telephone: 424.239.3400
11 Facsimile: 424.239.3434

12 Attorneys for Defendants
13 BUFFALO WILD WINGS, INC. and
14 BLAZIN WINGS, INC.

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 MARCHE MEEKS, on behalf of himself and others
18 similarly situated,

19 Case No. 3:17-cv-07129-EDL

20 Plaintiff,

21 vs.

22 BUFFALO WILD WINGS, INC., a Minnesota
23 corporation, BLAZIN WINGS, INC., a Minnesota
24 corporation, YELP, INC., a Delaware corporation,
25 NOWAIT, INC., a Delaware corporation,
26 WINGMEN V, LLC, a Washington limited liability
27 company, and DOES 1 THROUGH 50, inclusive,

28 Defendants.

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

L.R. 6-1(a)

Magistrate Judge Elizabeth D. Laporte

This stipulation is entered into by and between Plaintiff Marche Meeks (“Plaintiff”), Defendant Buffalo Wild Wings, Inc. (“BWW”), Defendant Blazin Wings, Inc. (“Blazin”), Defendant Yelp Inc. (“Yelp”) for itself and as successor-in-interest to Nowait, Inc. (“Nowait”), and Defendant Wingmen V, LLC (“Wingmen”) (collectively, “Defendants”), and made with reference to and in contemplation of the following facts and circumstances:

1. On October 10, 2017, Plaintiff filed a class action complaint (the “Complaint”) in the Superior Court of the State of California for the County of San Francisco.

2. On December 14, 2017, Yelp with the consent of Defendants timely removed the action to this Court, making its deadline to respond to the Complaint December 21, 2017.

3. Defendants each recently retained counsel in this matter. In order to allow sufficient time for Defendants to evaluate Plaintiff's claims, and to synchronize Defendants' respective deadlines to respond to Plaintiff's Complaint for the convenience of the parties and the Court, the parties have agreed that each Defendant may have until and including January 15, 2018 to plead or otherwise respond to Plaintiff's Complaint.

4. Extending the deadline for Defendants to respond to the Complaint to January 15, 2018 will not alter the date of any event or deadline already established by Court order.

IT IS SO STIPULATED between Plaintiff and Defendants that the time for Defendants to plead or otherwise respond to Plaintiff's Complaint is extended until and including January 15, 2018.

DATED: December 20, 2017 COUNSELONE, P.C.

By: /s/ Justin Kachadoorian
Anthony Orshansky
Alexandria Kachadoorian
Justin Kachadoorian
Attorneys for Plaintiff
MARCHE MEEKS

1 DATED: December 20, 2017

BLANK ROME LLP

2 By: /s/ Harrison Brown

3 Ana Tagvoryan
4 Safia Hussain
Harrison Brown
5 Attorneys for Defendants
6 BUFFALO WILD WINGS, INC. and
BLAZIN WINGS, INC.

7 DATED: December 20, 2017

REED SMITH LLP

9 By: /s/ Ashley Shively

10 Brian Sutherland
Ashley Shively
11 Attorneys for Defendant
12 YELP INC., for itself and as successor-in-interest to
NOWAIT, INC.

13 DATED: December 20, 2017

14 MANATT, PHELPS & PHILLIPS, LLP

15 By: /s/ Christine Reilly

16 Christine Reilly
17 Attorneys for Defendant
18 WINGMEN V, LLC

20 **SIGNATURE ATTESTATION**

21 Pursuant to L.R. 5-1(i) and General Order 45, I hereby attest that concurrence in the filing of
22 this document has been obtained from each of the other signatories, which shall serve in lieu of their
23 signatures on the document.

25 By: /s/ Harrison Brown
26 Harrison Brown

1
CERTIFICATE OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over the age of 18
4 and not a party to the within action. My business address is 2029 Century Park East, 6th Floor, Los
Angeles, California 90067.

5 On December 20, 2017, I served foregoing document entitled **STIPULATION TO**
6 **EXTEND TIME TO RESPOND TO COMPLAINT** on the interested parties in this action,
addressed and sent as follows:

7 **(SEE ATTACHED SERVICE LIST)**

- 8 **BY ENVELOPE:** by placing the original true copies thereof enclosed
9 in sealed envelopes addressed as indicated and delivering such envelopes:
- 10 **BY MAIL:** I caused such envelopes to be deposited in the mail at Los
11 Angeles, California with postage thereon fully prepaid to the office or
home of the addressees as indicated. I am "readily familiar" with this
12 firm's practice of collection and processing documents for mailing. It
is deposited with the U.S. Postal Service on that same day, with
postage fully prepaid, in the ordinary course of business. I am aware
13 that on motion of party served, service is presumed invalid if postal
cancellation date or postage meter date is more than one day after the
date of deposit for mailing in affidavit.
- 15 **BY E-MAIL OR ELECTRONIC TRANSMISSION (Courtesy):** I caused
16 a courtesy copy to be transmitted by e-mail or electronic transmission to the
person(s) at the e-mail address(es) as indicated.
- 17 **BY ELECTRONIC FILING:** I am familiar with the United States District
18 Court, Northern District of California's practice for collecting and processing
electronic filings. Under that practice, documents are electronically filed
with the court. The court's CM/ECF system will generate a Notice of
19 Electronic Filing (NEF) to the filing party, the assigned judge, and any
registered users in the case. The NEF will constitute service of the document.
Registration as a CM/ECF user constitutes consent to electronic service
20 through the court's transmission facilities. Under said practice, the CM/ECF
users in the attached Service List were served.

22 Executed on December 20, 2017, at Los Angeles, California.

23 I declare that I am employed in the office of a member of the bar of this court at whose
direction the service was made.

24
25
26 
DIA S. ALESSI

1
SERVICE LIST

2
VIA ECF:

3 Brian Adair Sutherland
4 Ashley Lynn Shively
REED SMITH LLP
5 101 Second Street, Suite 1800
San Francisco, CA 94105
Tel: 415-543-8700
Fax: 415-391-8269
Email: bsutherland@reedsmit.com
ashively@reedsmit.com

*Attorneys for Defendants,
YELP, INC. and NOWAIT, INC.*

8
VIA U.S. MAIL AND EMAIL:

9 Justin Kachadoorian
10 Alexandria R. Kachadoorian
11 Anthony J. Orshansky
COUNSELONE, PC
12 9301 Wilshire Boulevard, Suite 650
Beverly Hills, CA 90210
Tel: (310) 277-9945
Fax: (424) 277-3727
Email: justin@counselonegroup.com
alexandria@counselonegroup.com
anthony@counselonegroup.com

*Attorneys for Plaintiff,
MARCHE MEEKS*

13 Christine M. Reilly
14 MANATT, PHELPS & PHILLIPS, LLP
11355 W. Olympic Blvd.
15 Los Angeles, CA 90064
Tel: 310-312-4237
Fax: 310-996-7037
Email: reilly@manatt.com

*Attorneys for Defendant,
WINGMEN V, LLC*